

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.  
LITIGATION

) Civil Action No. 04-10294-DPW

) (Lead Case)

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THIS DOCUMENT RELATES TO:  
ALL CASES

) DATE: January 3, 2007

) TIME: 2:30 p.m.

) COURTROOM: 1

) The Honorable Douglas P. Woodlock

)

**LEAD PLAINTIFF'S NOTICE OF MOTION  
AND MOTION FOR CLASS CERTIFICATION**

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Attorneys for Lead Plaintiff  
BPI Global Asset Management LLP

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that Lead Plaintiff BPI Global Asset Management LLP ("Lead Plaintiff") will, and hereby does, move on January 3, 2007 at 2:30 p.m., in Courtroom 1 of the above-entitled Court, before the Honorable Douglas P. Woodlock, United States Courthouse, 1 Courthouse Way, Boston, Massachusetts, for certification of a plaintiff Class pursuant to Rule 23(a) and (b)(3), Fed.R.Civ.P., consisting of:

All persons or entities who purchased or otherwise acquired Sonus Networks, Inc. ("Sonus") securities from March 28, 2002 through March 26, 2004 and who were damaged thereby. Excluded from the Class are the defendants, officers and directors of the Company at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which defendants have or had a controlling interest.

Moreover, Lead Plaintiff moves for certification of a plaintiff Subclass pursuant to Rule 23(a), (b)(3) and (c)(4), Fed.R.Civ.P., consisting of:

All persons or entities who purchased or otherwise acquired newly issued Sonus securities pursuant to the Prospectus Supplement dated September 23, 2003 and who were damaged thereby. Excluded from the Subclass are the defendants, officers and directors of the Company at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which defendants have or had a controlling interest.

Lead Plaintiff further requests that it be appointed as the representative for the Class and Subclass, and that Gold Bennett Cera & Sidener LLP be appointed as counsel for the Class and Subclass, pursuant to Rule 23(g), Fed.R.Civ.P.

This motion is made on grounds that the requirements of Rule 23 of the Federal Rules of Civil Procedure are satisfied. This motion is further based upon this Notice of Motion and Motion, the accompanying memorandum of points and authorities and Declaration of Bjorn I. Steinholt, CFA, all other pleadings and papers on file in this action, and such other argument as

the Court may consider at the hearing on this motion.

Dated: July 31, 2006

GOLD BENNETT CERA & SIDENER LLP

By /s/ Solomon B. Cera  
Solomon B. Cera

Attorneys for Lead Plaintiff  
BPI Global Asset Management LLP